

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

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UNITED STATES OF AMERICA,

CLERK OF COURT

Plaintiff,

v.

DENNIS J. SCHAUMBERG,

Defendant.

Case No.:
[18 U.S.C. §§ 2252A(a)(5)(B) & (b)(2)]

21-CR-015

INDICTMENT

THE GRAND JURY CHARGES THAT:

1. On or about November 16, 2017, in the State and Eastern District of Wisconsin,

DENNIS J. SCHAUMBERG

knowingly possessed material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a minor who had not attained 12 years of age, and that had been shipped and transported using any means and facility of interstate and foreign commerce, and that was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, including by computer.

2. The child pornography possessed by the defendant included files identified by the following partial file names:

Partial File Name	Description
SHA1 Hash: d7711f...84b4589 MD5 Hash: 99bef2...7f10d3	A video approximately 34 seconds in length depicting an unknown male holding the head of a shirtless, prepubescent female while his penis ejaculates into her mouth. The female appears to be between the ages of four and eight years old.

SHA1 Hash: a914d5 . . . 3cf79
MD5 Hash: 041029 . . . 156d24

An image depicting a prepubescent female sitting on an unknown adult's lap with the adult holding the prepubescent female's legs apart, exposing her naked vagina. The female appears to be between the ages of one and three years old.

All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).

Forfeiture Notice

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 2252A, set forth in Count One of this Indictment, the defendant, Dennis J. Schaumberg, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253:

- a. any visual depiction described in Title 18, United States Code, Section 2252, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of such offense;
- b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such an offense; and
- c. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, including but not limited to: 1) one Seagate 500GB hard drive, model number ST9500325AS and serial number 5VECYXGA; and 2) one Seagate 200GB hard drive, model number ST3200822A, serial number 4LJ2NCT6 seized from the defendant on or about November 16, 2017.

2. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of

substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

[REDACTED]
FOREPERSON

Dated: Jan 12, 2021



MATTHEW D. KRUEGER
United States Attorney